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Co-Lead Counsel

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

*In re: Hyundai and Kia Engine
Litigation II*

Case No. 8:18-cv-02223-JLS-JDE

**DECLARATION OF MATTHEW D.
SCHELKOPF REGARDING
PLAINTIFFS' SUPPLEMENTAL
BRIEF IN SUPPORT OF MOTION
FOR CLASS COUNSEL FEE AND
EXPENSE AWARD AND CLASS
REPRESENTATIVE SERVICE
AWARDS**

Date: September 8, 2023
Time: 10:30 a.m.
Hon. Josephine L. Staton
Courtroom: 8A

I, Matthew D. Schelkopf, declare as follows:

1. I am an attorney admitted *pro hac vice* in this litigation, and a partner at the law firm of Sauder Schelkopf LLC (“Sauder Schelkopf”), and counsel of record for Plaintiffs in *In re: Hyundai and Kia Engine Litigation II*, No. Case No. 8:18-cv-02223-JLS-JDE (C.D. Cal.). I could and would competently testify to the matters stated in this declaration based on my personal knowledge or discussions with counsel in my firm.

2. This Court appointed me to serve as co-Lead Counsel alongside Steve Berman of Hagens Berman Sobol Shapiro LLP, and further appointed Gretchen Freeman Cappio of Keller Rohrback L.L.P. to serve as Settlement Counsel (together, “Class Counsel”) in this action. ECF No. 99, at 26.

3. I submit this supplemental declaration with Plaintiffs’ Supplemental Brief in Support of Motion for Class Counsel Fee and Expense Award and Class Representative Service Awards. Class Counsel seek \$8,900,000 in attorneys’ fees and actual costs up to \$300,000 for their work in this action that ultimately resulted in the class action settlement (“Settlement”) preliminarily approved by this Court on February 8, 2023. *See* ECF Nos. 99; 106.

SAUDER SCHELKOPF SUPPLEMENTAL LODESTAR AND EXPENSES

4. From June 24 to August 23, 2023, Sauder Schelkopf has spent 123.40 hours litigating this case, for a total firm lodestar of \$95,465.00. A summary of hours incurred by timekeeper, with respective rates and roles included, is below:

Name	Role	Rate	Hours	Lodestar
Matthew Schelkopf	Partner	\$825	91.70	\$75,652.50
Joseph Kenney	Partner	\$625	31.70	\$19,812.50
<u>Totals</u>			<u>123.40</u>	<u>\$95,465.00</u>

5. We are concurrently submitting our firm’s supplemental detailed time records in the required Excel format for the Court’s review *in camera* to protect any privileged information.

6. From June 24 to August 23, 2023, Sauder Schelkopf incurred \$413.56 in costs attributable to this litigation. This includes \$405.00 in mediation fees, and \$8.56 in postage and mailing.

7. Sauder Schelkopf is incurring more time and costs currently and expects to continue incurring time and costs through final approval, the claims deadline, and perhaps on appeal. Consistent with my prior Declaration in support of Plaintiffs' Motion for Class Counsel Fee and Expense Award and Class Representative Service Awards, my firm also expects to continue assisting class members with settlement claims and related issues for the foreseeable future. *See* Dkt. 106-6 ¶¶ 40-41.

8. When combined with our time and costs previously submitted to the Court on July 7, 2023, Sauder Schelkopf has spent 1,000.2 total hours litigating this case, for a total lodestar of \$756,237.50. My firm has also expended \$14,633.56 in total costs.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed August 25, 2023, at Berwyn, Pennsylvania.

By: /s/ Matthew D. Schelkopf
Matthew D. Schelkopf